CGB-CC-0742

RECEIVED & INSPECTED

OCT 9 - 2007

FCC - MAILROOM

DEEPERCALLING MEDIA INC

1065 Walther Blvd Lawrenceville GA 30043

Ph: 888 433 3788

Web: www.deepercalling.com

September 24th, 2007

Federal Communications Commission Attn: Secretary's Office Closed Captioning 445 12th Street SW Washington, DC 20554

RE: REQUEST FOR EXEMPTION FROM COMMISSION'S CLOSED CAPTIONING RULES

deeperCalling Media is a private held corporation based in Gwinnett County in Georgia. The purpose of the organization is to advance the state of the Arts through online and television media. We produce a self funded television show called "deeperLiving" which airs on Cable and Satellite. "deeperLiving" is a daily half our broadcast, aired Monday thru Friday.

The purpose of the program is to showcase artisans including Authors, Musicians, Designers and Craftsmen & women. We highlight their inspiration and their motivation for creating their artistic works. We are the only daily television program in the United States focusing exclusively on the story and art of American artisans.

Please accept this petition for exemption from Section 79.1 of the Commission's rules, implementing Section 713 of the Communications Act of 1934. The rules are threatening to the future of "deeperLiving", due to the overwhelming expense it would take to comply with such rules. Our program qualifies for exemption based on the following reasons:

Part 79.1 – Section (F)

deeperCalling Media, the producer of the "deeperLiving" to show, will be imposed with an undue burden if it has to comply for the following reasons:

1. In order to make all programs closed caption, we would need to outsource production as it is beyond the means of our staff.

The post production costs of adding in closed captioning would dramatically increase the budget required for production beyond our available means.

The cost of adding closed captioning to each TV program is \$295 (quote attached). We have

inquired of our broadcasters, and their rates for closed captioning are \$250 per half hour. The total monthly cost for closed captioning is between \$5000 and \$5900. This represents a 210% - 231% increase in the production budget.

2. We use minimal editing equipment, and staffing. Currently we produce 20 episodes per month, and we have a total budget of \$4,500 which includes staff, the purchase of airtime, supplies and shipping of tapes. We do not have sufficient budget to be able to increase costs. We do not sell advertising, nor do we have any sponsors or underwriters. The show is funded strictly from the profits generated from our online bookstore, which are currently stretched to the limit. It is simply not viable for us to increase production costs by an additional \$5000 - \$5900 per month. Should we be required to add closed captioning, we will have to cease production.

We request that deeperCalling media be exempted from the closed captioning requirement for the previously mentioned reasons. Should you have any further concerns, please contact us at 888 433 3788.

Regards,

Bill Goodyear

CEO.

Quotations for Closed captioning:

Quotation #1

iLifeTV has quoted us \$250 per half hour . This is a total cost of \$5,000 per month.

Quotation #2

Sourced from http://www.drtvcc.com . Please see the next two pages for copies of the quotation that was generated based on our request for a daily half hour tv program on Betacam tape.

The total cost for this quotation was \$5,900 per month for 20 episodes.





Closec
Calculation Results Show Title:
deeperLiving Service Type: Standard
Program Length: 30 Minutes
Are you providing a transcript? No Number of ADDITIONAL Dubs: 1
Your Shipping Selection
Ground Delivery
Your Master Selection
BetaCam

Your Final Output Media Selection

Beta-SP

Enter Shipping Information	Please supply the following informations fields marked with an * are required:		
*First Name	Bill		
*Last Name	Goodyear		
Company Name			
*Billing Address	1065 Walther Blvd	1065 Walther Blvd	
Suite/Apt			
*City	LAWRENCEVILLE *State	GA 🔊 *Zip	
*Telephone	888 433 3788 Mobile	e Phone	
*E-Mail	info@deepercalling.com	info@deepercalling.com	
If you would like us to ship to more than one address, please provide us dubs for each. Enter them in the field below. Please make sure to include individual you would like it directed to.			
Additional Address Information:			
3 -1-21 √ 1-295		decNow	

AFFIDAVIT OF COSTS

I, Bill Goodyear, CEO of deeperCalling Media, by my signature affixed to this document, do hereby make the following statement of fact affirm:

- 1. All the documents that have been submitted to the FCC are true and accurate to the best of my knowledge and belief.
- 2. The current production budget for the one month of deeperLiving television programming is approximately \$4,500 per month.
- 3. All other costs involved in the production of the episodes are donated by volunteers, including volunteer camera operators.
- 4. Based on the quotations received, the cost of adding closed captioning to our program would be an additional \$5,000 to \$5,900 per month depending on whether our broadcaster does the work, or if we go with the attached quotation from drtvcc.com.

I now affix my signature to these affirmations:

-ALL	
Bill Goodyear	
CEO	

Silver P. Bichardson Notary Public